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Otto Trucking LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc., et al.,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF RACHEL M. WALSH  
IN SUPPORT OF DEFENDANT OTTO  
TRUCKING'S MOTION TO ENFORCE  
THE COURT'S JUNE 7, 2017 ORDER  
(DKT. 563) AND TO JOIN AND ADOPT  
CO-DEFENDANTS UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC'S MOTION TO  
ENFORCE THE COURT'S JUNE 7, 2017  
ORDER (DKT. 563)**

Date: August 17, 2017

Time: 8:00 a.m.

Courtroom: 8, 19th Floor

Judge: Honorable William Alsup

Trial Date: October 10, 2017

1 I, Rachel M. Walsh, declare as follows:

2 1. I am counsel at the law firm of Goodwin Procter LLP, counsel of record for  
3 Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters  
4 within my own personal knowledge and if called as a witness, I could and would competently  
5 testify to the matters set forth herein. I make this declaration in support of Defendant Otto  
6 Trucking’s Notice of Motion and Motion to Enforce the Court’s June 7, 2017 Order (Dkt. 563)  
7 and to Join and Adopt Co-Defendants Uber Technologies, Inc. and Ottomotto LLC’s Motion to  
8 Enforce the Court’s June 7, 2017 Order (Dkt. 563), requesting that the Court issue an order to  
9 enforce the June 7, 2017 order, strike Waymo’s corrected supplemental initial disclosures, strike  
10 Waymo’s Patent Local Rule 3-8 contentions, and preclude damages claims as to Otto Trucking.

11 2. Attached hereto as Exhibit 1 is a true and correct copy of relevant excerpts of  
12 Defendant Otto Trucking LLC’s Objections and Responses to Plaintiff Waymo LLC’s First Set of  
13 Expedited Interrogatories, served on June 5, 2017.

14 3. Attached hereto as Exhibit 2 is a true and correct copy of relevant excerpts of  
15 Defendant Otto Trucking LLC’s Objections and Responses to Plaintiff Waymo LLC’s Third Set  
16 of Expedited Interrogatories, served on June 20, 2017.

17 4. Attached hereto as Exhibit 3 is a true and correct copy of relevant excerpts of  
18 Defendant Otto Trucking LLC’s Objections and Supplemental Responses to Plaintiff Waymo  
19 LLC’s Third Set of Expedited Interrogatories, served on July 7, 2017.

20 5. Attached hereto as Exhibit 4 is a true and correct copy of Plaintiff Waymo LLC’s  
21 Supplemental Initial Disclosures, served on June 21, 2017.

22 6. Attached hereto as Exhibit 5 is a true and correct copy of Plaintiff Waymo LLC’s  
23 Damages Contentions Pursuant to Patent Local Rule 3-8, served on June 26, 2017.

24  
25 I declare under penalty of perjury under the laws of the United States that the foregoing is  
26 true and correct. Executed this 7th day of July, 2017 in San Francisco, California.

27  
28 /s/ Rachel M. Walsh  
Rachel M. Walsh